



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

DEC 01 2015

8ENF-AT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matt Armstrong
Environmental Specialist
Williams Four Corners, LLC
188 CR 4900
Bloomfield, New Mexico 87413

Re: Section 114(a) Information Request for the Williams Ignacio Gas Plant,
La Plata County, Colorado

Dear Mr. Armstrong:

The United States Environmental Protection Agency (EPA) hereby requires Williams Four Corners LLC (Williams) to provide certain information to determine the Clean Air Act (CAA) compliance status of the Ignacio Gas Plant in La Plata County, Colorado.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. In order for the EPA to determine whether a violation of the CAA has occurred, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to the following request for information regarding the facilities listed above. Accordingly, within thirty (30) calendar days from receipt of this request, you must respond to this request. See the Instructions and Definitions in Enclosure 1 and the Information Requested in Enclosure 2.

You are required to attach a properly executed Statement of Certification (Enclosure 3) to your response to this request. The statement must be signed and dated. This statement certifies that the response submitted to the EPA is true, correct, accurate, and complete, and that the response contains all documents and information responsive to this request that are known to you, following a complete and thorough review of all information and sources available to you. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the Act, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this request; 3) the

initiation of a civil action pursuant to section 113(b) of the CAA, 42 U.S.C. § 7413(b); and/or 4) any other action authorized under the CAA. In addition, knowingly providing false information in response to this information request may be actionable under section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that emissions information is not considered confidential under section 114(c). For detailed instructions, please see Enclosure 4 to this letter. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

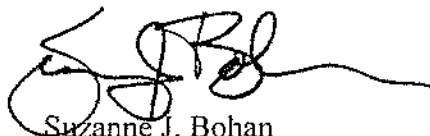
YOU MUST SUBMIT ALL RESPONSIVE INFORMATION: *Whether or not you make a claim of confidentiality.*

Please submit your response to this request to:

U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program (8ENF-AT)
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Laurie Ostrand

If you have any questions regarding this information request, please contact Laurie Ostrand at, 303-312-6437, or your counsel may contact David Rochlin, at 303-312-6892.

Sincerely,



Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures: 1) Instructions and Definitions
2) Information Requested
3) Statement of Certification
4) Confidential Business Information

cc: Mark Hutson, Southern Ute Indian Tribe

ENCLOSURE 1:

A. INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart or a question set forth in the Information Request. If Williams has no responsive information or documents pertaining to a particular request, submit an affirmative statement and explanation.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) (including name, title, and a description of job duties) that provided information that was used or considered in responding to that question, as well as each person (including name, title, and a description of job duties) who was consulted in the preparation of that response.
3. Indicate on each document produced in response to this information request, or in some other reasonable manner, the number of the question to which it corresponds. If a document is responsive to more than one request, this must be so indicated and only one copy of the document needs to be provided.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that either possesses or is likely to possess such documents or information.

B. DEFINITIONS

All terms used in this information request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401, other CAA implementing regulations (e.g. **Subpart HH** or **Subpart KKK**), or otherwise defined herein, in which case use the definition in the Act, the regulations or herein.

1. The term "Act" or "CAA" shall mean the Clean Air Act, 42 U.S.C. §§ 7401 et seq.
2. "Affected facility" shall mean, with reference to a stationary source, any apparatus to which a standard is applicable under the new source performance standards (NSPS) including, for example, **Subparts KKK, NNN, RRR, or OOOO**.
3. "Affected source," for the purposes of 40 C.F.R. part 63, shall mean the collection of equipment, activities, or both within a single contiguous area and under common control that is included in a section 112(c) source category or subcategory for which a section 112(d) standard or other relevant standard is established pursuant to section 112 of the Act. Each relevant standard will define the "affected source," as defined in this paragraph unless a different definition is warranted based on a published justification as to why this definition would result in significant administrative, practical, or implementation problems and why the different definition would resolve those problems. The term "affected source," as used in this 40 C.F.R. part 63, is separate and distinct from any other use of that term in EPA regulations such as those implementing title IV of the Act. Affected source may be defined differently for part 63 than affected facility and stationary source in parts 60 and 61, respectively. This definition of "affected source," and the

procedures for adopting an alternative definition of “affected source,” shall apply to each section 112(d) standard for which the initial proposed rule is signed by the Administrator after June 30, 2002.

4. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these, in Williams’ possession, custody or control or to which Williams has or has had access. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by the EPA, with all necessary documentation and support. All documents should also include all attachments to or enclosures for the document provided.
5. “EPA” shall mean the United States Environmental Protection Agency.
6. “Equipment” shall mean each pump, pressure relief device, open-ended valve or line, valve, compressor, sampling connection system, and flange or other connector that is **in VOC service, VHAP service, or wet gas service.**
7. “In VOC service” shall mean that the piece of equipment contains or contacts a process fluid that is at least 10 percent VOC by weight. (The provisions of 40 C.F.R. §§ 60.485(d) or 60.485a(d) specify how to determine that a piece of equipment is not in VOC service.)
8. “In volatile hazardous air pollutant (VHAP) service or in VHAP service” shall mean that a piece of equipment or compressor either contains or contacts a fluid (liquid or gas) which has a total VHAP concentration equal to or greater than 10 percent by weight as determined according to the provisions of 40 C.F.R. § 63.772(a).
9. “In wet gas service” shall mean that a piece of equipment contains or contacts the field gas before the extraction step in the process.
10. “LDAR” shall mean leak detection and repair.
11. “Subpart KKK” shall mean the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 C.F.R. §§ 60.630 et seq.
12. “Subpart NNN” shall mean the Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, 40 C.F.R. §§ 60.660 et seq.
13. “Subpart RRR” shall mean the Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes, 40 C.F.R. §§ 60.700 et seq.
14. “Subpart OOOO” shall mean the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution, 40 C.F.R. §§ 60.5360 et seq
15. “Subpart HH” shall mean the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, 40 C.F.R. §§ 63.760 et seq.

16. "Volatile organic compounds or VOC" shall mean, for the purposes of Subparts KKK and OOOO, any reactive organic compounds as defined in 40 C.F.R. § 60.2 Definitions
17. "Volatile hazardous air pollutant concentration or VHAP concentration" shall mean the fraction by weight of all HAP contained in a material as determined in accordance with procedures specified in §63.772(a).

ENCLOSURE 2:

INFORMATION REQUESTED:

Using the instructions and definitions set forth in Enclosure 1, provide the following information within thirty (30) calendar days from receipt of this request unless otherwise specified. Where possible, any information not requested in editable electronic format should be provided in portable document format (PDF). If any of the information has been previously submitted to the EPA in its entirety, Williams has the option of resubmitting the information or identifying the previous submission and certifying that the previously-submitted information is true, accurate and complete in accordance with Enclosure 3. Terms in boldface are defined in Enclosure 1.

1. Provide a summary and general history of the Ignacio Gas Plant (the Plant), including the various processes (for example inlet, dehydration, fractionation, extraction, amine unit, storage, separation, etc.), the year that each process was added, and the products produced. Indicate how the feed enters, and products exit, the Plant, e.g., truck, pipeline, etc. Provide the design capacity and average throughput through the facility over the past six months in million standard cubic feet per day (MMscfd). Provide a plot plan and block flow diagram for the Plant. Please annotate the Plot Plan indicating where the various processes are located. Also indicate on the Plot Plan the location of each engine/compressor or turbine/compressor by name.
2. Provide a description of the entities that own and operate the Ignacio Gas Plant, including a description of the relationships between any entities involved in ownership or operation.
3. Provide in editable electronic format, on compact disc or other electronic storage media, a list of the **equipment** associated with each process described in response to Request 1. For each piece of **equipment** on this list provide the following:
 - a. Its unique identifying number (e.g., **LDAR** tag number). For **equipment** which does not have a unique identification number, use the identification number of the closest process vessel with a unique number, followed by a dash and unique number to describe the piece of **equipment** (e.g., D404-001);
 - b. List the **equipment** type (e.g., valve, pump, compressor, connector, pressure relief device, etc.);
 - c. **Equipment** sub-type where known (e.g., gate-valve, check-valve, dual-seal pump, flange, screwed connector, etc.);
 - d. Line-size in inches (e.g., 2, 3, 4, 6, etc.);
 - e. Date of physical installation;
 - f. Whether the **equipment** is in **VOC service**, **VHAP service**, or **wet gas service**;
 - g. Date the **equipment** was placed in **VOC service**, **VHAP service**, or **wet gas service**; and
 - h. Indicate the state and federal regulations to which the piece of **equipment** is subject.
4. For **equipment** not in **VHAP service** provide the documentation of the demonstration required by 40 C.F.R. §63.772(a).

4. For **equipment not in VHAP service** provide the documentation of the demonstration required by 40 C.F.R. §63.772(a).
5. For **equipment not in VOC service**, provide the documentation of the demonstration required by 40 C.F.R. §§ 60.632(f) and 60.485(d).
6. Provide in editable electronic format, on compact disc or other electronic storage media, a complete backup copy of the facility **LDAR** records management database. Provide the data in a format such that all information can be readily viewed in Microsoft Access. Include in your response the name and version of the fugitive emissions monitoring database program the facility is currently using.
7. For each instance in which **equipment** was installed at the Ignacio Gas Plant, provide a copy of any calculations performed to determine the applicability or non-applicability of **Subpart KKK** and/or **Subpart OOOO**.
8. Provide a detailed analysis indicating whether or not the Ignacio Gas Plant has any **affected facilities** under **Subpart NNN** or **Subpart RRR**.

ENCLOSURE 3

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Printed Name)

(Title)

(Date)

ENCLOSURE 4

Confidential Business Information (CBI) Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until

a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.

3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

David Rochlin
U.S. EPA Region 8
1595 Wynkoop Street (ENF-L)
Denver, CO 80202-1129
(303) 312-6892

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). See 40 C.F.R. § 2.204(e)(6). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.